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Electronic Benefit Transfer Photo Requirement Exemptions Report

March 2025



**DEPARTMENT OF TRANSITIONAL ASSISTANCE
ELECTRONIC BENEFIT TRANSFER
PHOTO REQUIREMENT EXEMPTIONS REPORT**

MARCH 2025

REPORT OVERVIEW

Massachusetts General Law, Chapter 18, Section 2 (B)(s) requires DTA to file an annual report detailing the numbers of recipients exempt from the Electronic Benefit Transfer (EBT) card photo requirement and the reasons for such exemptions.

DEPARTMENT OF TRANSITIONAL ASSISTANCE MISSION

DTA’s mission is to assist and empower low-income individuals and families to meet their basic needs, improve their quality of life, and achieve long-term economic self-sufficiency. DTA offers a comprehensive system of programs and supports to help individuals and families achieve greater economic self-sufficiency, including food and nutritional assistance, economic assistance, and employment supports.

EBT PHOTO REQUIREMENT

In August 2013, the Legislature passed a law requiring the use of photo identification on each newly issued, and reissued, EBT card. The requirement covered recipients who are 18 or older that are designated to be the “head of household” on a DTA assistance case. Other classes of recipients are exempted from the requirement as follows:

- 60 years of age or over
- Disabled
- Blind
- Victims of domestic violence

DTA must also comply with federal laws. The United States Department of Agriculture Food and Nutrition Service (USDA-FNS) requires that heads of households who do not receive Supplemental Nutrition Assistance Program (SNAP) benefits on their own behalf be exempted (e.g., some relative caretakers of minor children). Exemptions based on religious beliefs also must be allowed.

EBT PHOTO EXEMPTIONS BY PROGRAM

The following table, compiled as of November 30, 2024, details the number of current households that have been exempted from the photo requirement.

Exemption	SNAP	TAFDC	EAEDC
Younger than 19	938	171	39
Older than 59	229,808	1,592	12,891
Domestic Violence	16,857	7,633	758
Disabled	269,740	7,752	21,243
Religious Exemption	58	<11	<11
Homeless	63,842	5,451	4,977
Non-Applicant*	4,555	356	126

- The head of household may qualify and be counted in more than one exemption category; total number of exemptions will be higher than the total caseload.
- For client privacy, demographic data under 11 is suppressed.

* The United States Department of Agriculture Food and Nutrition Service (USDA-FNS) has informed DTA that any Head of Household that is not included in the household benefit calculation is exempt from having a photo on an EBT card. These individuals are not clients, but are caretakers of clients unable to serve as a Head of Household.